



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JEA
F. #2018R00673

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 25, 2021

By Federal Express and ECF

Morris J. Fodeman, Esq.
Wilson Sonsini Goodrich & Rosati
1301 Avenue of the Americas, 40th Floor
New York, NY 10019

Re: United States v. Ashiqul Alam
Criminal Docket No. 19-280 (LDH)

Dear Mr. Fodeman:

Enclosed please find government discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which is being produced pursuant to the Stipulation and Order entered by the Court on June 21, 2021.

The enclosed hard drive contains the following:

- Video and audio recordings between the defendant and undercover officers, Bates-numbered ALAM_000001-ALAM_000003, ALAM_000006, and which is marked Sensitive Discovery;
- Surveillance footage taken by the defendant of potential targets, including Times Square, Bates-numbered ALAM_000004-ALAM_000005, and which is marked Sensitive Discovery;
- Transcripts of conversations between the defendant and undercover officers, Bates-numbered ALAM_000007-ALAM_004804, and which is marked Sensitive Discovery;
- Reports of the defendant's meetings with undercover officers, Bates-numbered ALAM_004805-ALAM_005072, and which is marked Sensitive Discovery;

- A copy of a warrant and an affidavit in support of a warrant to search a premises at 70-35 Broadway Apt E-19, Jackson Heights, NY 11372, signed June 6, 2019, Bates-numbered ALAM_005073-ALAM_005102, and which is marked Sensitive Discovery;
- A copy of a warrant and an affidavit in support of a warrant to search various devices seized from the defendant during his arrest on June 6, 2019, signed June 7, 2019, Bates-numbered ALAM_005103-ALAM_005131, and which is marked Sensitive Discovery;
- A copy of a warrant and an affidavit in support of a warrant to search various devices seized from the premises at 70-35 Broadway Apt E-19, Jackson Heights, NY 11372, signed June 12, 2019, Bates-numbered ALAM_005132-ALAM_005184, and which is marked Sensitive Discovery;
- A copy of a warrant and an affidavit in support of a warrant to search YouTube accounts belonging to the defendant, signed August 21, 2019, Bates-numbered ALAM_005185-ALAM_005212, and which is marked Sensitive Discovery;
- Records obtained from Facebook obtained pursuant to a search warrant, Bates-numbered ALAM_005213-ALAM_006930;
- Evidence collected item log regarding a premises search of 70-35 Broadway Apt E-19, Jackson Heights, NY 11372 on June 6, 2019, Bates-numbered ALAM_006931-ALAM_006932;
- Records obtained from various third parties regarding the defendant, Bates-numbered ALAM_006933-ALAM_006964; and
- Photographs of the firearms with obliterated serial numbers purchased by the defendant on or about June 6, 2019, Bates-numbered ALAM_006965-ALAM_006968.

The government also renews its request for reciprocal discovery from the defendant.

Very truly yours,

JACQUELYN M. KASULIS
Acting United States Attorney

By: /s/
David K. Kessler
Jonathan E. Algor
Assistant U.S. Attorneys
(718) 254-7202/6248

Enclosures

cc: Clerk of the Court (LDH) (by ECF) (without enclosures)